



Attorneys and Counselors at Law

556 Peninsula Blvd., Hempstead, New York 11550

Phone: 516-489-6959 • Fax: 516-489-6958 • www.brewingtonlaw.com

Frederick K. Brewington
Cathryn Harris-Marchesi
Tricia S. Lindsay
Albert D. Manuel III

Oscar Holt III
Of Counsel

March 10, 2020

VIA ELECTRONIC CASE FILING

Honorable Steven I. Locke
United States Magistrate Judge
United States District Court
Eastern District of New York
Long Island Federal Courthouse
100 Federal Plaza
Central Islip, New York 11550

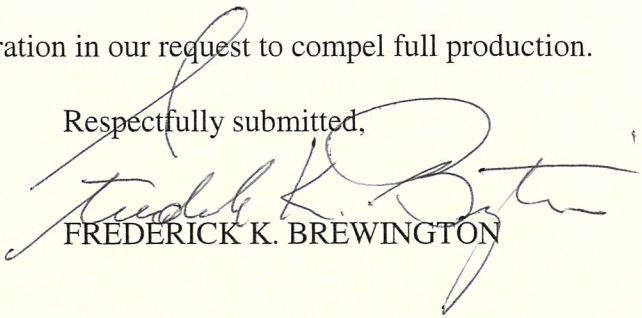
Re: *Nunez v. Village of Rockville Centre, et.al.*
Docket No.: CV-18-4249 (DRH)(SIL)

Dear Judge Locke:

As your records will reflect, we are the attorneys representing the Plaintiff in the above-referenced matter. While we are aware that in letter motions, reply submissions are not the norm, we write with the sole purpose of correcting misstatements. In the opposition dated March 8, 2020 and filed by the County Defendants on March 9, 2020, they state that in our opening papers we assert that in the Log that "County Defendants reference only 20 pages in the privilege log." This statement is not accurate. In our letter-motion dated March 4, 2020, we clearly stated that, "That document (hereinafter "Log") has 20 documents which are referenced by Bates number and Subject. (See Exhibit B)" The reference was to 20 documents not "20 pages" as argued by Defendants. Secondly, I respectfully beg to differ with the Defendants, as the issues relating to all the deficiencies in Defendants responses was raised in the context of the redactions, which were clearly discussed. Never was there a suggestion that the County's responses were anything but fully unresponsive. However, the redactions were the first issues which needed to be addressed before taking the document as a whole.

We thank the Court for its kind consideration in our request to compel full production.

Respectfully submitted,


FREDERICK K. BREWINGTON

cc: Andrew R. Fuchs, Esq.
William P. Nolan, Esq.
William J. Croutier, Jr., Esq.
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